Inter-Office Memorandum

WESTON MANAGERS DESIGNERS/CONSULTANTS

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FROM: Steve Fuller

DATE: 20 September 1989

PROJECT: American Crossarm and Conduit

W.O. NO.: 4000-01-21
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SUBJECT: Summary of Scoping Meeting

ACTION:

This memorandum contains a summary of discussions, comments, and action items compiled from the American Crossarm and Conduit scoping meeting of 15 September 1989. The purpose of this memo. is to document the project scoping process and provide additional input for flushing out the outline for RI/FS work plans.

Please review this memo to ensure that points which you may have made in the meeting are accurately summarized. If you have points that may have not been brought out in the meeting which you feel are important and wish them to be evaluated for incorporation in the RI\FS work plans, please call me (286-6000) or Lee Marshall (442-2723) by Tuesday, 26 September.

INTRODUCTION

An introduction to the meeting and the project was given by Lee Marshall (RPM). A list meeting attendees is attached to the memo.

BACKGROUND

The following points were brought up during a summary of the background information provided in the site background report (SBR):

- The RI report should include a discussion on the relationship between the soils containing PCP that were placed on residential yards back in 1986 and the RI/FS.
- The toxicity status of PCP and dioxin has been elevated since the time of the flood cleanup action. This may influence risk assessments and laboratory detection limits needed for

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portions of the RI, and raises renewed concern for areas impacted by the flood. Consideration for sampling in areas affected by the flood for a full priority pollutant compound list should be given as well as an up-front assessment of potential risk. The up-front risk assessment could potentially be based on existing data.

- The boundary of the site will be affected by our early decisions or sampling data.

- The SBR did not adequately cover the dioxin concentrations in the landfill.

- A source of ecological habitats information not referenced in the SBR is Kathy Kunz, EPA.

- An additional source of aerial photographs of the property may exist with Mike Sardary (Corps of Engineers) and Mike Blum via the Department of Transportation.

POSSIBLE INTERIM REMEDIAL ACTIONS

Four interim remedial measures were discussed;

- Restrict access
- Remove PCB-containing equipment
- Asbestos abatement
- Eliminate incompatible on-site activities

Efforts to restrict casual access and to remove incompatible use of the property are in progress. Marshall and Grotheer are looking into a vehicle to fund asbestos and PCB equipment inventories and removal activities.

CHARACTERIZATION EFFORTS BY SOURCE AREA AND RECEPTOR

Wood Treatment Area

Hydrologists expressed interest in setting a meeting to evaluate

- Regional hydrologic map.

- Geologic map.

- Geologic sections.

- Surface water elevation maps with time.

- o Assessment of sinkers/floaters in groundwater.

- o References.

- o More detailed information regarding the location of tanks, piping, and vessels needs to be characterized for location and possible asbestos contamination.

The purpose of the meeting will be to outline the proposed placement of new wells and outline the phases of the groundwater investigation of the RI. The purpose of this meeting is to receive detailed input for the RI work plans.

- o Groundwater sampling in wood treatment area should focus on BTX, PCP, PAHs, dioxin, and creosote supplemented with screening analysis for other constituents.

Disposal Area

- o Assess the fill history of the landfill with aerial photographs supplemented with a ground-penetrating radar (GPR) survey

- o Try to obtain historical documents or conduct interviews to establish past generator histories.

- o Sampling in disposal area should focus on PCP, dioxin, and creosote, supplemented with screening analysis for other constituents.

- o Evaluate the disposal area as an uncontrolled landfill with screening sampling

  - VOCs
  - Semi-volatile and volatile compounds on a GC/MS basis
  - Specific volatile compounds, after screening
  - Metals

- o Assess the use of a geoprobe or drive tip to assess water quality

Ground Surface Under the Pile-Supported Structures

- o The general consensus was soil in this area should be sampled for the same constituents as the area to the north and east of the facility (i.e., areas affected by the flood).

- o It may be possible to sample soils by cutting through floors and using extensions on soil augers.

Wetland South of the Facility

- A full characterization of the wetland may be warranted (including pesticides).
- An assessment of the functions and value of the wetland should be made (functional equivalency).
- The major action item from this discussion was to arrange a meeting between WESTON and EPA staff to resolve constituents of concern, exchange ideas, and discuss appropriate guidance.

Dillenbaugh Creek

- Consider phasing of the creek sampling.
- Analysis of sediments in the creek should include PCP, PAHs, and dioxin.
- Sediment toxicity bioassays should be run on the sediments.
- One sediment sample is recommended for the Chehalis River within 2000 feet downstream from the confluence Dillenbaugh Creek.

Storm Sewer

- Assessment of the interior of the storm sewer is prudent. Access to the sewer is problematic. Alternatives discussed to evaluate the condition of the inside of the sewer tile included installing manways and a remote camera.
- The quality of soil or groundwater in direct contact with the sewer is not known and may warrant assessment.

Storm Water Discharge Lagoon

- Sampling of the lagoon was discussed; the following points were raised:
  - Sampling should characterize the vertical and lateral distribution of compounds in the sediments. The list of compounds will be derived from meetings of the ecological risk assessment group.
  - Sampling will be done using conventional thin-walled tube or vibracoring techniques.
- The lagoon should be treated as a habitat for the RI.

Air

- An air sampling program should be included in the RI plans to provide data on volatile emissions (PCP) and particulates (PCP and dioxin). A risk screening should be done for air emissions.

TREATABILITY STUDIES

Any analysis of treatability studies and or evaluation of possible remedial actions should take into account that the land ban on disposal should be totally phased in. Alternatives to land disposal are necessary.

Consideration of technologies for remediation of wetlands and the creek should be evaluated prior to design of the sampling plans.

Sampling should be for total metals as well as toxic contaminant leaching procedure (TCLP) to support the FS and disposal options.

POTENTIAL ARARS

The following legislation was brought up that may be ARAR:

- Endangered Species Act
- Cultural resources Protection Act
- Historic preservation
- PSDA
- UST/LUST RCRA
- Ecology UST
- Washington State Air Quality Regulations to be promulgated in 1990

PUBLIC INVOLVEMENT

If the RI has components that involve going back into the community (i.e., flood affected areas) then additional support to EPA may be necessary.

ACTION ITEMS

- Prepare summary of meeting
- Arrange meeting of hydrologists
- Arrange meeting of risk assessment people
- Arrange meeting of air toxics folks

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cc: Frank Monahan
Lee Marshall